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ATTORNEY FOR THE EMPLOYEES RETIREMENT  
SYSTEM OF TEXAS

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:	)	
	)	Chapter 11
Sears Holding Corporation, <i>et al.</i> ,	)	
	)	Case No. 18-23538 (RDD)
Debtors.	)	(Jointly Administered)
	)	
Sears Holding Corporation, <i>et al.</i> ,	)	
	)	
Plaintiffs,	)	
	)	Adv. Pro. No. 20-07007
v.	)	
Andrew H. Tusch, <i>et al.</i> ,	)	
	)	
Defendants.	)	
	)	

**MOTION FOR ADMISSION TO PRACTICE, PRO HAC VICE**

I, Jason B. Binford, request admission, *pro hac vice*, before the Honorable Robert D. Drain, to represent the Employees Retirement System of Texas, by and through the Office of the Attorney General of Texas, a defendant in the above-referenced case.

*I certify that I am a member in good standing* of the bar of the State of Texas and, if applicable, the bar of the U.S. District Court for the Western District of Texas.

I have submitted the filing fee of \$200.00 with this motion for *pro hac vice* admission.

Dated: January 26, 2021

Respectfully submitted,

KEN PAXTON  
Attorney General of Texas

BRENT WEBSTER  
First Assistant Attorney General

GRANT DORFMAN  
Deputy First Assistant Attorney General

SHAWN COWLES  
Deputy Attorney General for Civil Litigation

RACHEL R. OBALDO  
Assistant Attorney General  
Chief, Bankruptcy & Collections Division

/s/ Jason B. Binford  
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ATTORNEYS FOR THE EMPLOYEES RETIREMENT  
SYSTEM OF TEXAS

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing has been served via the Court's Electronic Filing System on all parties requesting notice in this proceeding on January 26, 2021.

/s/ Jason B. Binford  
JASON B. BINFORD  
Assistant Attorney General